

BRANDON CHURCH,
1719 Elwood Street
St. Joseph, MO 64505

V.

Defendant.

JURY TRIAL DEMANDED

COMES NOW Plaintiff Brandon Church, through undersigned counsel, and for this cause of action against Defendant Michael Scott Cole, states and alleges as follows:

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- b. Defendant failed to keep a careful lookout;
- c. Defendant failed to brake, slacken speed, swerve, or sound a horn after danger of collision became apparent; and
- d. Defendant failed to exercise the highest degree of care in the operation of a motor vehicle and was therefore negligent.

8. As a direct and proximate result of the collision which was caused by the negligent acts and/or omissions of Defendant as fully set forth above, Plaintiff Brandon Church suffered the following progressive and disabling injuries: concussion with loss of consciousness; traumatic brain injury; brain bleed; left tibia and fibula fractures; left femur fracture; left arm brachial plexus injury; left shoulder injuries; fractured jaw; sprains and strains to his neck and back; lost wages; loss of household services, and he has incurred expenses for medical treatment, and will likely incur additional expense for medical treatment, all to his detriment in an amount in excess of twenty-five thousand dollars.

WHEREFORE, Plaintiff Brandon Church prays for judgment against Defendant Michael Scott Cole in an amount in excess of Seventy-Five Thousand Dollars (\$75,000.00) and for his costs and expenses incurred herein, and for such further relief as this Honorable Court deems just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Federal Rules of Civil Procedure 38(b), Plaintiff requests a trial by jury of all issues triable as of right.

Respectfully submitted,

MONTEE LAW FIRM, P.C.

/s/ James Montee
James Montee, MO #33489

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